

SANDLER REIFF

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March 19, 2018

Via E-Mail

Jeff S. Jordan, Esq.
Office of the General Counsel
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Dear Mr. Jordan:

The undersigned serves as counsel to the Utah State Democratic Committee ("USDC") and Peter Corroon, in his official capacity as Treasurer. I am writing in response to the Commission's letter of January 29, 2018 in connection with the above-referenced referral.

For the reasons set forth below, the USDC respectfully requests that OGC recommend that no further action be taken in this matter or, in the alternative, that this matter be referred to the Alternative Dispute Resolution Division for further proceedings.

This matter relates to an apparent [redacted] for reporting issues related to the USDC's reports for the 2015 and 2016 calendar years. A review of the reporting errors reveals several fixable errors that the USDC is in the process of correcting with an outside consultant to fix and file amended reports. In addition, the USDC notes that the [redacted] includes four OGC referable issue related to clarifications, and in one instance, the addition of financial activity to hits 12 Day Pre-General Report. Please note that most of the additional activity reported relates to a transfer received from Hillary Victory Fund, a joint fundraising committee in which the USDC participated. The failure to include these transfers resulted from a miscommunication between the joint fundraising representative and the USDC and the report has been amended to include these transfers. Please note that both the Hillary Victory Fund and the Democratic National Committee, committees that were both involved in this inadvertent omission, timely disclosed transfers to and from the USDC on this reports.

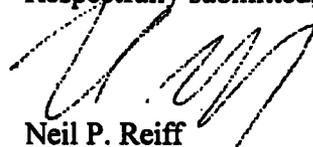
The USDC anticipates that its comprehensive amendments will address the remaining issues revealed in the Commission's report and will certainly correct issues related to the shortfall of memo entries related to joint fundraising.

The USDC acknowledges that there have been reporting issues in the past, most of which was caused by an outside consultant who had been handling the USDC's reports for several years. Unbeknownst to the USDC, the consultant, who had been responsible for preparation of reports and all correspondence with the Commission, had not been responding to ordinary requests for additional information from the Commission. The consultant is no longer associated with the USDC and the committee has taken steps to ensure that its compliance operation is responsive to Commission inquiries.

It is my understanding that the USDC will be providing the comprehensive amendments that will address the issues described above by close of business today, or shortly thereafter. The USDC believes that this matter is more appropriate for diversion to its ADR program in accordance with the normal practice for audit eligible committees who are not ultimately the subject of an audit for that election cycle.

If you have any further questions, please contact me at (202) 479-1111.

Respectfully submitted,



Neil P. Reiff
Counsel for the Utah State
Democratic Committee, and Peter
Corroon, in his official capacity as
Treasurer